

EXHIBIT A

PROPOSED DEADLINES

Dates	Modified Dates	Event
	April 8, 2025	Initial Rule 16 Management Conference
	April 9, 2025	Opening of Fact Discovery
	April 18, 2025	Serve Initial Disclosures
April 18, 2025	May 19, 2025	P.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions (and P.R. 3-2 document production) to be served.
May 13, 2025	June 9, 2025	Join Additional Parties.
May 13, 2025	June 16, 2025	P.R. 3-3 Invalidity Contentions (and P.R. 3-4 document production) to be served. To extent not already required to be disclosed, exchange Mandatory Disclosures on all issues, including damages.
May 23, 2025	June 30, 2025	Parties to exchange proposed terms for construction and identify any claim element governed by 35 U.S.C. § 112, ¶ 6 (P.R. 4-1).
June 12, 2025	July 14, 2025	Parties to exchange preliminary proposed claim construction and extrinsic evidence supporting same (P.R. 4-2).
July 8, 2025		Parties' Final Amended Pleadings (A motion for leave is required.)
July 14, 2025	August 4, 2025	Joint Claim Construction and Prehearing Statement to be filed (P.R. 4-3). Provide an estimate of how many pages are needed to brief the disputed claims.
July 29, 2025		Respond to Amended Pleadings
August 11, 2025		Completion date for discovery on claim construction (P.R. 4-4)
August 26, 2025		Opening claim construction brief (P.R. 4-5(a)).
September 9, 2025		Responsive claim construction brief (P.R. 4-5(b)).
September 16, 2025		Reply claim construction brief (P.R. 4-5(c)).

September 16, 2025		Submit technology synopsis/tutorial (both hard copy and disk).
October 6, 2025		Parties to file joint claim construction and chart (P.R. 4-5(d)). Parties shall work together to agree on as many claim terms as possible.
October 14, 2025		Proposed Claim Construction hearing October 14, 2025, at 9:00 a.m. at the Paul Brown United States Courthouse, 101 E. Pecan Street, Sherman, Texas 75090.
May 27, 2025	November 7, 2025	Privilege Logs to be exchanged by parties (or a letter to the Court stating that there are no disputes as to claims of privileged documents).
November 18, 2025		Deadline for Initial Mandatory Disclosure of all persons, documents, data compilations and tangible things, which are relevant to a claim or defense of any party and which has not previously been disclosed. This deadline is not an extension of earlier deadlines set out in this court's order or the Patent Rules, nor an excuse to delay disclosure of information. It is a "catchall" deadline for provision of all remaining information which may be relevant to a claim or defense of any party at trial.
	March 13, 2026	Deadline to Complete Fact Discovery and File Motions to Compel Discovery.
December 16, 2025	April 13, 2026	Parties with burden of proof to designate Expert Witnesses other than claims construction experts and provide their expert witness reports, to include for ALL experts all information set out in Rule 26(a)(2)(B).
	May 4, 2026	Comply with P.R. 3-7. (Designation of Willfulness Opinions).
December 30, 2025	May 11, 2026	Parties to Designate Expert Witnesses on issues for which the parties do not bear the burden of proof, and provide their expert witness report, to include for ALL experts all information set out in Rule 26(2)(B). Note: Objections to any expert, including <i>Daubert</i> motions, shall be filed within 3 weeks after the expert's Report has been disclosed. Such objections and motions are limited to ten pages each.

January 23, 2026	June 12, 2026	Expert Discovery Deadline. All expert discovery must be served in time to be completed by this date.
	July 13, 2026	Deadline to File Dispositive Motions and any other motions that may require a hearing. Regardless of how many dispositive motions a party files, each party is limited to a total of sixty pages for such motions. Each individual motion shall comply with Local Rule CV-7. Responses to motions shall be due in accordance with Local Rule CV-7(e).
	August 3, 2026	Deadline to File Responses to Dispositive Motions.
	August 17, 2026	Deadline to File Replies in support of Dispositive Motions.
	August 24, 2026	Deadline to File Sur-Replies in support of Dispositive Motions.
April 13, 2026	August 24, 2026	Notice of intent to offer certified records.
April 13, 2026	August 24, 2026	Counsel and unrepresented parties are each responsible for contacting opposing counsel and unrepresented parties to determine how they will prepare the Joint Final Pretrial Order (<i>See</i> www.txed.uscourts.gov) and Proposed Jury Instructions and Verdict Form (or Proposed Findings of Fact and Conclusions of Law in nonjury cases).
April 20, 2026	August 31, 2026	Deposition Designation due. Each party who proposes to offer a deposition shall serve on all other parties a disclosure identifying the line and page numbers to be offered. All other parties will have seven calendar days to serve a response with any objections and request cross-examination line and page numbers to be included. Counsel must consult on any objections, and only those which cannot be resolved shall be presented to the Court. The party who filed an initial Video Deposition Designation is responsible for preparation of the final edited video in accordance with all parties' designations, the applicable Federal Rules of Civil Procedure, and the Court's rulings on objections.

		<p>Serve witness list.</p> <p>Serve exhibit list.</p> <p>Exchange proposed jury instructions and verdict forms.</p>
	September 14, 2026	<p>Serve objections to deposition designations; serve rebuttal deposition designations.</p> <p>Serve objections and rebuttals to witness lists and exhibits lists.</p>
April 20, 2026	September 21, 2026	<p>Motions <i>in limine</i> due.</p> <p>File Joint Final Pretrial Order. Exchange Exhibits and deliver copies to the court. At this date, all that is required to be submitted to the court is a hyperlinked exhibit list on disk (2 copies) and no hard copies.</p>
May 4, 2026	October 5, 2026	<p>Response to motions <i>in limine</i> due.</p> <p>File objections to witnesses, deposition extracts, and exhibits, listed in pre-trial order. (This does not extend the deadline to object to expert witnesses). If numerous objections are filed the court may set a hearing prior to the final pretrial conference.</p> <p>File Proposed Jury Instructions/Form of Verdict (or Proposed Findings of Fact and Conclusions of Law).</p> <p>If Parties will be requesting daily copy of the transcript during trial, they must notify the Court's court reporter, Chris Bickham, Chris_Bickham@txed.uscourts.gov, by this date.</p>
May 18, 2026	October 19, 2026	<p>Final Pretrial Conference at 1:00 p.m. at the Paul Brown United States Courthouse, 101 E. Pecan Street, Sherman, Texas 75090.</p>
TBD		<p>10:00 a.m. Jury Selection and Trial at the Paul Brown United States Courthouse located at 101 East Pecan Street in Sherman, Texas.</p>